

As a general comment, I am struck by the impressive reasonableness of the Petition. It is fully consistent with the 2.8 kHz maximum SSB bandwidth recently required in the newly authorized 60-meter (5.3 MHz) amateur band. Apparently, the Commission is convinced that such bandwidth limitations are reasonable, readily implemented, and beneficial to users of the spectrum, thereby enabling more operators to enjoy use of the new band. As a licensed Extra class amateur, I agree entirely with this approach to maintaining the communications capabilities of our amateur bands.

It is instructive to consider the number of stations the 200 kHz J3E allocation on the 14 MHz amateur band could accommodate at three different bandwidths: One, as considered in the proposal, two and three, representative of bandwidths used by wide-band sideband proponents.

1) Using 2.8 kHz, the entire J3E band capacity (assuming propagation characteristics typical for transcontinental communications within the USA) would be $200/2.8 = 71$ stations.

2) At a bandwidth of 3.5 kHz, the capacity would be $200/3.5 = 57$ stations.

3) At a bandwidth of 6 kHz, the capacity would be $200/6 = 33$ stations.

In today's increasingly crowded band conditions, especially during contests and weekends, failing to maintain the proposed limit of 2.8 kHz would result in a 25% reduction in communications capacity in the second case, and a reduction of over 115% in the third case. While one may argue this is a theoretical example, it is conceivable that the wide-band sideband phenomenon might well grow to the point where such reductions in capacity would be an everyday occurrence.

On the air observations at present seem to indicate that number of extremely broad sideband stations has been reduced, most likely in response to the Advisory Notices sent by Mr. Hollingsworth, and to the Petition. I believe this salutary effect is only temporary.

Unless the ambiguity in Part 97 regarding J3E bandwidth is removed, with time, the offensive and inconsiderate wide-band practice may return, and in so doing, engender significant reduction in the usable capacity of our amateur bands.

Therefore, I urge the Commission to adopt RM-10740 as proposed. Thank you for your attention and concern.

Respectfully submitted,

Thomas F. Poland
Amateur Extra Class license: N9NC